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UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

DENISE ANDERSON,

Plaintiff,

VS.

LAWRENCE LIVERMORE NATIONAL SECURITY HEALTH AND WELFARE BENEFIT PLAN FOR EMPLOYEES; ANTHEM BLUE CROSS LIFE AND HEALTH INSURANCE COMPANY,

Defendants.

Case No.: 3:11-cv-03865 JW

JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO FILE ADMINISTRATIVE RECORD

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Plaintiff Denise Anderson ("Plaintiff"), Defendant Anthem Blue Cross Life and Health Insurance Company ("ABCLH"), and Defendant Lawrence Livermore National Security Health and Welfare Benefit Plan for Employees ("Lawrence Livermore") hereby submit, through the undersigned, the following Joint Stipulation and [Proposed] Order To Extend Time to File Administrative Record:

WHEREAS on August 5, 2011, Plaintiff filed her ERISA complaint in the above-titled action in the United States District Court Northern District of California;

WHEREAS the Court issued a Scheduling Order setting the Deadline for Filing Administrative Record as March 19, 2012;

WHEREAS the Parties attended a mediation with Ralph Williams of ADR Services and believe they are very close to potentially resolving their dispute and agreeing to a settlement;

WHEREAS the Administrative Record contains confidential medical records protected by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the Parties wish to avoid submitting the records, if possible, given the potential imminent resolution;

WHEREAS the Parties wish to continue the Deadline for Filing Administrative Record by three weeks to April 9, 2012 to allow the Parties time to potentially reach a settlement agreement and dismiss the action; AND

WHEREAS this change to the Deadline for Filing Administrative Record will not alter the date of any event or any deadline already fixed by Court order;

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